

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**OMAR HURLOCK, on behalf of himself  
and all others similarly situated,  
*Plaintiff,***

**vs.**

**KELSIER VENTURES, KIP PROTOCOL,  
HAYDEN DAVIS, GIDEON DAVIS,  
METEORA, THOMAS DAVIS, JULIAN  
PEH, and BENJAMIN CHOW,  
*Defendants.***

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**Case No. 25 Civ. 3891 (JLR)**

**DECLARATION OF DEFENDANT HAYDEN DAVIS**

I, Hayden Davis, hereby declare as follows:

1. My name is Hayden Davis, I am over the age of 18, and I am competent and of sound mind to make this declaration, which I do of my own free will.

2. I am making this declaration under the understanding that I have not and am not consenting to jurisdiction in New York.

3. The Viva La Libertad! Project (“VVL Project”) was conceived of in Argentina. It was supposed to be launched on the Meteora platform, which I understood at all times was, and is, based in Singapore. The \$LIBRA coin was to be traded on the Solana blockchain. to the best of my knowledge, the Solana Foundation is based in Zug, Switzerland. The \$LIBRA launch was intended to be traded worldwide, and to the best of my knowledge, was traded all over the world (as are all meme tokens).

4. I do not reside in New York, nor have I ever resided there. I do not have an office in New York, nor have I ever maintained an office in New York. I do not transact business in New York, regularly or otherwise. I do not own property of any kind in New York, nor to my knowledge, have I ever owned any real or personal property in New York.

5. All \$LIBRA tokens that were offered were made available to any buyer in the world, and not specifically to anyone in New York. I had no meetings in New York regarding \$LIBRA. I did not transact business with anyone in New York to buy or sell \$LIBRA, nor did I cause the \$LIBRA to be minted from New York nor through any New York-based entity.

6. Prior to the \$LIBRA launch, I was last in New York in November 2024 for a visit completely unrelated to \$LIBRA, which was not even conceived of at that time.

7. I did not create the Viva La Libertad! website in New York, nor was it created on a NY-based domain host. The [www.vivalalibertadproject.com](http://www.vivalalibertadproject.com) is a passive website that anyone can affirmatively choose to visit from anywhere in the world using an internet connection. I did not target any promotion of the VVL Project to New York. I caused no advertisements for \$LIBRA to be placed in New York, nor targeting persons in New York.

8. The VVL Project was initiated in order to benefit small businesses in Argentina as stated on the Viva La Libertad website. Within seconds after the launch, three ‘snipers’ (early buyers) who are unknown to me purchased large quantities of \$LIBRA. I can identify those snipers only by wallet addresses. I had no advanced knowledge that those snipers existed, nor do I have direct knowledge of who these snipers are. I was not one of the snipers, as I did not purchase any \$LIBRA for my own account or for the account of any other person.


9. After the launch of the project, President Javier Milei made a post on X about \$LIBRA. As is the phenomenon with meme coins, this generated interest and resulting purchases, pushing the price of \$LIBRA up. A short time later, President Milei chose to delete his post on X. To date, I have no knowledge as to why he did this as I was not a party to, nor was I informed of, his decision to do so prior to the deletion of the post. My understanding was that \$LIBRA would be used for the benefit of small businesses and educational initiatives in Argentina as stated on the

VVL website. Right after the launch, many in the social media sphere attacked \$LIBRA as a fake or a scam. These claims were, and continue to be, false. President Milei's decision to delete his post on X gave fuel to the claims that \$LIBRA was a scam, but the claims continue to be false and efforts to put into effect the ambitions of the \$LIBRA project have been rendered impossible to resurrect while this court order is in effect.

10. I do not know the named Plaintiff, and to my knowledge, I did not transact any business of any kind with him to my knowledge, nor did I have any communications whatsoever with him.

11. I have never been served the summons or complaint personally or at my home or my office or place of work.

**I declare under penalty of perjury that the foregoing is true and correct and within my personal knowledge.**

Signed by:  
  
9411EF61F7814B9...  
Hayden Davis

6/23/2025

Date